



VIA ELECTRONIC SUBMISSION

June 14, 2017

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: CC Docket No. 02-6 WAIVER REQUEST

CONTACT INFORMATION:

Service Provider Name: Sunesys, LLC
SPIN: 143019764
Contact Person: Gena C. Ragnoli
Address: 185 Titus Avenue, Warrington, PA 18976
E-Mail: gragnoli@sunesys.com
Phone: (267) 927-2071
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APPLICANT INFORMATION:

Applicant Name: Montebello Unified School District
Funding Year: 2015
FRN: 2852486
BEN: 143514
471 Application No.: 1045399

“Funding Year 2015 – Last Date to Invoice Missed”

This is a request for a Waiver/Appeal of the Last Date to Invoice for

MONTEBELLO UNIFIED SCHOOL DISTRICT

Waiver Request:
Funding Year 2015 Last Date to Invoice Deadline Missed
Form 471 No. 1045399

Funding Request Number: 2852486

TOTAL Dollar Amount Requested: \$254,380.50

**Reason for Denial:**

The last date to invoice USAC for FRN 2852486 was 6/10/2017.

Rationale for Request:

Sunesys' had the responsibility of submitting invoices to USAC for the committed amount of \$254,380.50 for Applicant Montebello Unified School District (FY2015) before the "Last Date to Invoice" provided as June 10, 2017.

Process that Lead to the Error:

Sunesys, LLC underwent billing integration into new software upon acquisition by parent company, Crown Castle International, Inc. This billing integration has been ongoing and has imposed many unforeseen delays and changes in the way Sunesys' accounting practices have traditionally operated. An administrative error was made on our part, as we failed to notice that this specific deadline was upon us, which resulted in Sunesys' missing the Last Date to Invoice by three (3) business days.

Circumstances to Consider:

Sunesys, LLC has been a program participant and compliant with applicable rules for nearly two decades. The recent upheaval within USAC and specifically the instability of the EPC database have placed a further burden on our daily business operations as it relates to the E-Rate program. These circumstances, coupled with our billing integration into new accounting software are not the specific reasons Sunesys missed the deadline, but are being respectfully submitted for careful consideration as contributing factors to explain the challenges Sunesys' has diligently been working to overcome.

Request for Relief:

Sunesys, LLC respectfully requests a one-time waiver of the "Last Date to Invoice" date of June 10, 2017 for Montebello Unified School District, FRN 2852486.

Your favorable consideration in this matter is greatly appreciated.

Sincerely,

Gena Ragnoli
Contract Manager

Sunesys, LLC

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